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Attorney for Defendant and
 CounterClaimant
 GUAN HUANG

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

WELLS FARGO BANK, N.A., AS TRUSTEE
 For the CLARA POPPIC TRUST,

Plaintiff,

v.

KENNETH G. RENZ, et al.,

Defendants.

CASE NO. CV-02561-SBA

GUAN HUANG'S INITIAL DIS-
 CLOSURES

Complaint Filed: May 21, 2008

Trial Date: None Set

RELATED COUNTER-CLAIMS AND
 CROSS-CLAIMS

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Order Setting Initial Case Management Conference and ADR Deadlines, dated May 21, 2008, and the Case Management Scheduling Order for Reassigned Cases, dated August 19, 2008, Defendant and Counter-Claimant Guan Huang (hereinafter "Huang") hereby makes initial disclosures. Huang reserves all rights to further supplement this disclosure under the rules and directions of the Court, and to withhold

1 production of documents under applicable privileges, doctrines or other law.

2 A. Individuals likely to have discoverable information supporting Huang's claims or defenses.

3 1. Guan Huang. c/o translators Karen Huang 415-357-6559 or Ken Huang 415-608-
4 1605. 1831 40th Avenue, San Francisco, CA 94122. Subjects include, but are not necessarily
5 limited to, Huang's involvement at the site, sale of interest in the dry cleaner business, history and
6 costs of involvement, response, etc., and facts underlying Huang's counterclaims.

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8 2. Sui Song. Address and telephone information currently being investigated and
9 confirmed. Telephone: _____. 1650 13th Avenue, Oakland, CA 94606. Subjects
10 include, but are not necessarily limited to, Huang's involvement at the site, sale of interest in the
11 dry cleaner business, history and costs of involvement, response, etc.

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13 3. Employees and former employees of Plaintiff Wells Fargo Bank. Addresses and
14 Telephone information known to Plaintiff.

15 4. Employees and former employees of environmental consultants retained by Plaintiff
16 Wells Fargo Bank. Addresses and Telephone information known to Plaintiff.

17 5. Geoffrey Fiedler, employee of the City of Berkeley, Toxics Management Division,
18 responsible for project management for the City. 510-981-7460. 2118 Milvia Street, Berkeley,
19 CA 94704. Subjects include, but are not necessarily limited to, investigation and remediation at
20 the site, history of the site, etc.

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22 B. Description by category and location of documents.

23 1. Documents obtained from the files of the City of Berkeley, including, but not limited
24 to reports, letters, work plans, business plan certifications from 1988, sampling results, etc.

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26 2. Documents relating to the lease of the site by Huang together with others, and the
27 limited time of involvement by Huang at the site.

1 3. These documents are located at the office of Huang's counsel, Karl R. Morthole, 57
2 Post Street, Suite 801, San Francisco, CA 94104, 415-986-0227. Arrangements will be made upon
3 request either to provide copies of non-protected/non-privileged documents or to make them
4 available for inspection and copying.
5

6 C. Damages by Category and Amount.

- 7 1. Attorney's fees through July 31, 2008, of \$3,540.00.
8 2. For general economic and consequential damages of an amount to be determined.
9 3. For costs for the investigation, testing, remediation and clean up of the contamination
10 on, under, adjacent to or downgradient from the Property and the surrounding areas in an amount
11 to be determined.
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13 D. Insurance.

14 None. Investigation continues.

15 Dated: August 20, 2008

Respectfully submitted,

16 LAW OFFICES OF KARL R. MORTHOLE

17 By /s/ Karl R. Morthole

18 Karl R. Morthole
19 Attorney for Guan Huang
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CERTIFICATE OF SERVICE

I declare that on the date set forth below, I served the attached

GUAN HUANG'S INITIAL DISCLOSURES

by e-filing and by placing in the U.S. Mail a true and correct copy in a sealed envelope, postage prepaid, addressed as set forth below:

Won Jae Yi
Defendant in Pro Per
2565 Telegraph Ave.
Berkeley, CA 94704

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the date hereinafter set forth.

San Francisco, CA
Date: August 20, 2008

/s/ Karl R. Morthole
Karl R. Morthole